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**Building The
Wireless Future™**

March 26, 1998

CTIA

Cellular
Telecommunications
Industry Association
1250 Connecticut
Avenue, N.W.
Suite 200
Washington, D.C. 20036
202-785-0081 Telephone
202-785-0721 Fax

RECEIVED

MAR 26 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Salas
Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, DC 20554

**Re: Ex Parte Presentation
CC Docket No. 94-102**

Dear Ms. Salas:

On Thursday, March 26, 1998, the Cellular Telecommunications Industry Association ("CTIA") represented by Michael Altschul, Vice President and General Counsel, Ed Hall, Assistant Vice President for Technology and Network Operations, and Andrea Williams, Assistant General Counsel, met with the following Commission staff concerning the FCC's E9-1-1/TTY compatibility requirements:

Dan Phythyon, Chief, Wireless Telecommunications Bureau
Jerry Vaughan, Deputy Chief, Wireless Telecommunications Bureau
John Cimko, Chief, Policy Division, Wireless Telecommunications Bureau
Nancy Boocker, Deputy Chief, Policy Division, Wireless Telecommunications Bureau
Jim Rollins, Legal Advisor to Bureau Chief, Wireless Telecommunications Bureau

At the meeting, CTIA discussed the progress of the TTY Forum Working Groups, and their need for FCC guidance on several issues. Specifically, CTIA asked if the Commission would accept, as a short term solution, CMRS carriers ability to provide TTY users with one (or more) model of TTY-compatible digital phones by October 1, 1998. Mr. Phythyon stated that in his view carriers who can offer TTY users at least one digital phone model at a reasonable price by October 1, 1998, would be considered in compliance of the E9-1-1/TTY compatibility requirements. Mr. Phythyon also noted that manufacturers of CMRS equipment have their own obligation under Section 255 of the Communications Act with respect to the accessibility or compatibility of their products for TTY users. CTIA noted that this guidance would assist the Working Groups in focusing their efforts on a short-term solution in order to meet the October 1, 1998 compliance date. CTIA also emphasized that the TTY Forum will continue its work with respect to developing long term solutions.

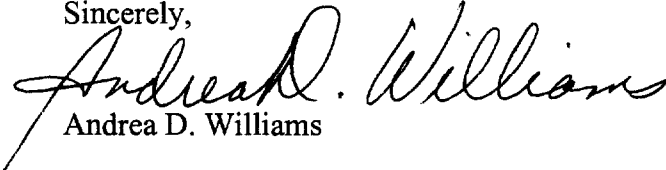
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CTIA also asked how the TTY Forum could best communicate with the FCC concerning its activities. Mr. Phythyon indicated that the quarterly status reports submitted by the TTY Forum would be an appropriate mechanism to inform the Commission and seek Commission guidance on regulatory issues that may arise during future meetings. CTIA also asked that a Commission representative attend TTY Forum meetings as an observer. In addition, CTIA provided the attached information concerning the TTY Forum's activities.

Pursuant to Section 1.1206 of the Commission's Rules, an original and one copy of this letter and its attachments are being filed with your office. If you have any questions concerning this submission, please contact the undersigned.

Sincerely,

A handwritten signature in cursive script that reads "Andrea D. Williams". The signature is written in dark ink and is positioned above the printed name.

Andrea D. Williams

TARGETED INFORMATION

Date: March 10, 1998
To: TTY/TDD Forum
From: Forum Co-Chairs
RE: TTY/TDD Forum-4

The meeting dates for the TTY/TDD Forum-4 have been set for **April 1 and 2, 1998** in Washington, DC at the:

Gallaudet University Kellogg Conference Center (GUKCC)
800 Florida Ave., NE
Washington, DC 20002-3695
Tel: (202) 651-6000
Fax: (202) 651-6107

The conference center hotel room rate has been negotiated at \$89/single or double. Please reference "CTIA/PCIA TTY/TDD Forum" when making your room reservations. Parking at the visitor's garage is \$5.00 per day. GUKCC is about 6 minutes from Union Station and about 20 minutes from National Airport. Taxi fare from National is about \$12. Please note that the location is in North East D.C. A list of additional hotels in the area is also attached.

The meeting will begin at 9:00 a.m. April 1 and conclude at 5:00 p.m. April 2 will begin at 9:00 a.m. and conclude by 1:00 p.m. The registration fee is \$175 (approved slot assignments exempt). Lunch will be served on Wednesday. There will be morning breaks on both days and an afternoon break on Wednesday only. Dress is business casual.

If you have any questions please call Ed Hall at (202) 736-3259; e-mail: ehall@ctia.org, Mary Madigan at (703)739-0300 Ext. 3011; e-mail: madiganm@pcia.com, or Janette Stout at (202)736-3224; e-mail: jstout@ctia.org.

TTY/TDD FORUM - 4

Washington, DC
(At Gallaudet University
Kellogg Conference Center)
April 1 & 2, 1998

AGENDA (Start Time 9:00 AM)

- | | |
|--|------------------------------------|
| 1. Call to Order & Opening Remarks | Co-Chairs, CTIA/PCIA |
| 2. Introductions and Attendance Roster | Co-Chairs |
| 3. Call for and Numbering of Contributions | Co-Chairs |
| 4. Review & Approve Agenda | Co-Chairs |
| 5. Review & Approve TTY Forum - 3 Summary | Co-Chairs |
| 6. Review TTY Forum <i>Agreements</i> | Steering Committee ¹ |
| 7. Review TTY Forum Correspondence | Co-Chairs |
| 8. TTY Regulatory Updates: <i>FCC; CTIA; NAD; TDI</i> | Appropriate Reps |
| 9. Review / Impacts RE: <i>TTY Consumer Notification</i> | Open Discussion |
| 10. Pursue New Agreement Statements RE: <i>Carrier and
Manufacturer Responsibilities as of 10/1/98</i> | Co- Chairs |
| 11. Working Group Reports | |
| • Working Group #1/3: TTY over Voice Services
and Coupling. Through Put Testing | Wesley Howe
Doug Neeley, Chairs |
| • Working Group #2: TTY via Data Services | Brye Bonner, Chair |
| 12. Discuss and Define <i>End User Test</i> | Toni Dunne |
| 13. How to Implement TTY Forum Solutions/Proposals | Open Discussion |
| 14. New Business/Next Steps. Develop list of Analog
phones and devices best suited for TTY transport | Co-Chairs |
| 15. Next Meeting | Co-Chairs |
| 16. Adjournment | Co-Chairs |

¹ TTY Forum Steering Committee: Toni Dunne; Billy Ragsdale; Claude Stout; Norm Williams; Jeff Crollick, John Melcher

From: tbrooks@NOKNHM01DA.ntc.nokia.com
[SMTP:tbrooks@NOKNHM01DA.ntc.nokia.com]
Sent: Monday, March 23, 1998 10:53 AM
To: EHall@mailgw.cia.org
Subject: TTY connections devices

Hi Ed,

I seem to be getting mixed signals on something, depending on who the information is coming from, so I thought I would just go to the guy running the show.

Is it necessary for TTY users to be able to dial 9-1-1 from the TTY device, or is it OK to have them dialing it from the mobile?

Also, are we dealing with callback? If so, how? Does the mobile just need to ring (or flash, or vibrate), and then signal appropriately with the TTY device such that information can start being transferred, or does the mobile need to pass the signaling to the TTY device so that the TTY device can alert the user in the manner it normally uses?

Regards,
Terri

From: Ed Hall
Sent: Monday, March 23, 1998 11:37 AM
To: 'tbrooks@NOKNHM01DA.ntc.nokia.com'
Cc: 'John Melcher'; 'Jeff Crollick'; 'tdd@earthlink.net'; 'bragsdale@bellsouth.com'; 'tdiexdir@aol.com'; 'nswilliams@gallaudet.edu'
Subject: RE: TTY connections devices

Terri,

Your questions are good ones. Let me try to answer. The TTY Forum has not addressed the operational requirements of the MS - TTY device, and I don't know if we really want to. It certainly is not within our scope... however! If answers to these and other MS operational questions foster the development of a commercial product for the 10/1/98 deadline... then by all means I think we should. (Steering Group please comment)

On the agenda for TTY-4 I have a topic that deals with carrier responsibilities for 10/1/98 (i.e. one model digital phone capable of TTY... not all models offered by a carrier). Maybe we should expand this agenda topic to address Manufacturer concerns re: MS operational "preferences".

As you can see I am asking the Steering Group for their comments. It may show up on the agenda. If so (or not) be prepared with some contributions.

SK
ED

PS: David is on our "friends of SciTech" list. He'll be "OK"

February 18, 1998

Mr. Ron Schultz
Vice President for Quality & Compliance
Ultratec
450 Science Drive
Madison, WI 98033

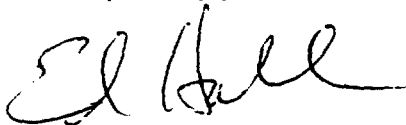
Dear Ron,

We are writing to express our serious concern with the lack of participation of the TTY manufacturing community in the third forum on digital wireless phone/TTY compatibility. As you are aware, the purpose of these forums is to facilitate discussion and identify solutions to meet the Federal Communications Commission's October 1998 E911-TTY compatibility requirements. TTY-3 was held on February 11 and 12 at Gallaudet University, and was hosted by the Cellular Telecommunications Industry Association (CTIA) and the Personal Communications Industry Association (PCIA). The forum was well represented by wireless operators, wireless manufacturers, consumer advocates, and public safety representatives, however no TTY manufacturers attended the conference.

Successfully implementing the E911-TTY compatibility requirement requires a two-part solution. Both the manufacturers of telecommunications equipment and the manufacturers of text telephones must share the burden of ensuring compatibility with each other's products. As the industry has experienced with the wireless Hearing Aid Compatibility ("HAC") issue, if there are two products which have inherent problems operating together, the responsibility to resolve the problem should be shared between the two parties. In this case, FCC involvement was useful in bringing the hearing aid manufacturers and wireless phone manufacturers together.

Wireless manufacturers and operators are accustomed to regulatory oversight by the FCC, and understand the importance of complying with Commission mandates. However, we recognize that TTY manufacturers do not share the same historical experience with the Commission. We believe that under the new federal guidelines (Section 255 of the Telecommunications Act), TTY (CPE) manufacturers have a legal obligation to make their equipment accessible and/or compatible with other commonly used telecommunication equipment. Therefore, while TTY manufacturers do not fall under regulatory obligation under the E911 rules, TTY manufactures should be expected to participate in the E911 activities because of their obligations under Section 255. If we are to meet the requirement of passing TTY emergency calls over digital wireless phones, your participation is critical. The fourth TTY/digital wireless compatibility forum will be held on April 1st and 2nd in the Washington, D.C. area. Please contact Janette Stout at (202) 736-3224 for further information. We look forward to working with you in the months ahead.

Respectfully yours,



Ed Hall
CTIA

Mary Madigan
PCIA



Ultratec, Inc. • 450 Science Drive, Madison, Wisconsin 53711 • (608) 238-5400 (Voice/TDD) • FAX (608) 238-3008

March 24, 1998

Mr. Ed Hall, CTIA
Ms. Mary Madigan, PCIA
c/o Cellular Telecommunications Industry Association
1250 Connecticut Ave., N.W.
Suite 200
Washington, DC 20036

Dear Ed and Mary,

I was disappointed to receive your letter on March 6th, expressing "serious concern with the lack of participation of the TTY manufacturing community for the third forum on digital wireless phone/TTY compatibility". We are sorry if Ultratec's absence at the February TTY-3 forum caused any inconvenience to any of the forum members. However, we take exception to the letter and its suggestion that this one and only absence by Ultratec is an indication of our commitment to the wireless/text telephone (TTY) forum. I can not comment on why the other TTY manufacturers have chosen not to attend or be part of the CTIA meetings, but Ultratec Inc. certainly has made this commitment to assist the wireless industry.

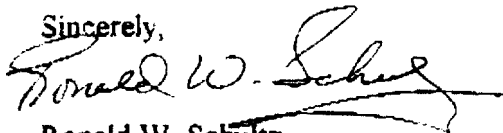
Ultratec questions the rationale behind sending such a letter to a company that has been present and actively participating in work with the wireless industry to help resolve wireless/TTY concerns. A review of our activity concerning the CTIA proceedings indicate that Ultratec has provided speakers, hours of phone and email consultation, and technical expertise from top level and technical personnel to assist the wireless industry. In addition, we have drafted proposed test procedures and technical information for work group consideration. We have also provided test machines, sometimes specially retrofitted at no additional cost. Indeed, we have provided TTY technical information and assistance long before the CTIA forums were organized (i.e., We provided TTY specifications and technical assistance to the GSM-NA Ad Hoc Group). We believe Ultratec has made a very significant contribution to an issue that we can only help with, but not directly resolve.

Ultratec is committed to assuring our TTY consumers have access to E-911 services, and recognize the wireless industry has a legal obligation to provide such service. It needs to be acknowledged, however, that we are not providers of wireless digital telephone equipment and can only serve in a capacity of assisting the wireless industry in making certain that thousands of individuals with existing text telephone (TTY) equipment are assured emergency wireless access. We can and will assist to resolve connection problems between wireless telephones and TTYs. However, we can not change or be responsible in any way for the wireless system and its compatibility with TTY signals.

We believe the Telecommunications Act Section 255 obligations should not be mixed into the primary objective at hand on the E-911 wireless issue. Section 255 states: CPE and SCPE manufacturers that design, fabricate and manufacture new equipment that has the ability to "originate, route, and terminate" have an obligation to make their equipment accessible for individuals with disabilities, if it is readily achievable to do so. We routinely provide products that will benefit a wide range of disabilities. This is demonstrated by our products for individuals who are Deaf, Hard of Hearing and Deaf-Blind. Ultratec has been serving the needs of those with disabilities long before the Telecommunications Act of 1996 was enacted, and will continue its ongoing commitment to those with disabilities in accessing telecommunications equipment as we have done for over 20 years.

Ultratec is available to provide information and advise where we can be helpful. However, as a small company we do not have the same financial resources as the much larger wireless communication companies to dedicate to this matter. We currently are providing consultation at no cost, and paying to travel and participate with minimal revenue return anticipated. We believe by sending the letter of February 18th, the CTIA/PCIA has failed to recognize the extensive effort Ultratec has made. However, we are interested in assisting our customers to be able to reliably use TTY equipment on wireless systems. To that end, we remain committed to assisting the wireless industry to resolve the problems that the digital wireless system is experiencing with TTYs.

Sincerely,



Ronald W. Schultz
Vice President, Quality & Compliance

cc CTIA-TTY Forum Members